

Michael J. Frevola

HOLLAND & KNIGHT LLP

195 Broadway

New York, NY 10007-3189

(212) 513-3200

JUDGE BATTS

ATTORNEYS FOR PLAINTIFF

AK LINE SHIPPING & TRADING LTD.

08 CV 2182

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

AK LINE SHIPPING & TRADING LTD.,

Plaintiff,

-against-

KASPI LOJISTIK VE DIS TIC. LTD. STI. a/k/a

KASPI LOJISTIK VE DIS TICARET LIMITED SIRKETI

a/k/a CASPI CARGO LINES,

Defendant.

08 Civ. _____

**AFFIDAVIT IN
SUPPORT OF ATTACHMENT**

STATE OF NEW YORK)

) ss:

COUNTY OF NEW YORK)

Michael J. Frevola, being duly sworn, deposes and says:

1. I am a member of the firm of Holland & Knight LLP, attorneys for plaintiff AK Line Shipping & Trading Ltd. ("Plaintiff"), and I am duly admitted to practice before the United States District Court for the Southern District of New York.

2. I am familiar with the facts and circumstances underlying this dispute and I am submitting this affidavit in support of the Verified Complaint and the Writ of Attachment.

3. Defendant Kaspi Lojistik Ve Dis Tic. Ltd. Sti. a/k/a Kaspi Lojistik Ve Dis Ticaret Limited Sirketi a/k/a Caspi Cargo Lines ("Defendant") is not listed in the telephone directory of the principal metropolitan areas in this district, nor is it listed in the Transportation Tickler, a recognized commercial directory in the maritime industry.

4. Our office contacted the Secretary of State for the State of New York and was advised that Defendant Kaspi Lojistik Ve Dis Tic. Ltd. Sti. a/k/a Kaspi Lojistik Ve Dis Ticaret Limited Sirketi a/k/a Caspi Cargo Lines ("Defendant") is neither a New York business entity, nor is it a foreign business entity authorized to do business in New York.

5. To the best of my information and belief, Defendant Kaspi Lojistik Ve Dis Tic. Ltd. Sti. a/k/a Kaspi Lojistik Ve Dis Ticaret Limited Sirketi a/k/a Caspi Cargo Lines ("Defendant") cannot be found within this district or within the State of New York.

6. Based upon the facts set forth in the Verified Complaint, I respectfully submit that the Defendant Kaspi Lojistik ve Dis Tic. Ltd. Sti. is liable to Plaintiff for the damages alleged in the Verified Complaint, which amounts, as best as can be presently determined, to a total of US\$ 225,440.00, including estimated interest, expenses and attorneys' fees.

7. Upon information and belief, Defendant Kaspi Lojistik Ve Dis Tic. Ltd. Sti. and/or Kaspi Lojistik Ve Dis Ticaret Limited Sirketi and/or Caspi Cargo Lines has property, goods, chattels or effects within this jurisdiction, to wit: funds or accounts held in the name of

Defendant Kaspi Lojistik Ve Dis Tic. Ltd. Sti. and/or Kaspi Lojistik Ve Dis Ticaret Limited Sirketi and/or Caspi Cargo Lines at one or more of the following financial institutions:

Bank of America, N.A.

Bank of China

The Bank of New York

Citibank, N.A.

Deutsche Bank Trust Company Americas

HSBC Bank USA, N.A.

JPMorgan Chase Bank, N.A.

UBS AG

Wachovia Bank, N.A.

Société Générale

Standard Chartered Bank

BNP Paribas

Calyon Investment Bank

American Express Bank

Commerzbank

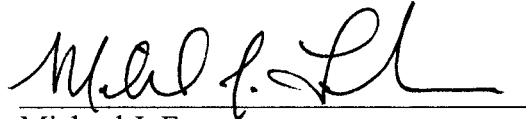
ABN Amro Bank

Bank Leumi USA

Banco Popular

8. Plaintiff is, therefore, requesting that this Court, pursuant to Rule B(1) of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure, issue a writ of maritime attachment for an amount up to \$225,440.00.

WHEREFORE, Plaintiff respectfully requests that the application for a writ of maritime attachment and garnishment be granted.


Michael J. Frevola

Sworn to before me this
4th day of March, 2008


Notary Public

WALLIS BETH KARPf
Notary Public, State Of New York
No. 01KA6047092
Qualified In New York County
Commission Expires August 28, 20 10